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May 26, 2005

Mr. Charles Terreni  
Chief Clerk of the Commission  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Joint Petition for Arbitration of NewSouth Communications Corp., NuVox Communications, Inc., KMC Telecom V, Inc., KMC Telecom III LLC, and Xspedius [Affiliates] an Interconnection Agreement with BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the Communications Act of 1934, as Amended  
Docket No. 2005-57-C

Dear Mr. Terreni:

Pursuant to the Joint Motion Regarding Procedure that was filed today in this docket by separate cover, BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the attached CDs that contain the following items from the Florida<sup>1</sup> and North Carolina<sup>2</sup> proceedings to be incorporated into the record of this docket:

1. BellSouth's Responses to FPSC Staff's Discovery Requests filed in the Florida proceeding.
2. Joint Petitioners' Responses to FPSC Staff's Discovery Requests filed in the Florida proceeding.

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<sup>1</sup> *In the Matter of Joint Petition for Arbitration of NewSouth Communications Corp., NuVox Communications Corp., KMC Telecom V, Inc., KMC Telecom III LLC, and Xspedius Communications, LLC on Behalf of its Operating Subsidiaries Xspedius Management Co. Switched Services, LLC and Xspedius Management Co. of Jacksonville, LLC*; Docket No. 040130-TP.

<sup>2</sup> *In the Matter of: Joint Petition for Arbitration of NewSouth Communications Corp., et al. of an Interconnection Agreement with BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the Communications Act of 1934, as Amended*; Docket Nos. P-772, Sub 8; P-913, Sub 5; P-989, Sub 3; P-824, Sub 6; P-1202, Sub 4.

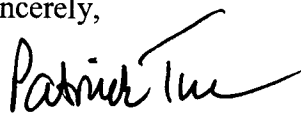
Mr. Charles Terreni  
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3. FPSC Staff Depositions (including exhibits) of BellSouth's and Joint Petitioners' witnesses
4. Transcript of hearing (including hearing exhibits) in the Florida proceeding.
5. BellSouth's Responses to Joint Petitioners' Discovery Requests filed in the North Carolina proceeding.
6. Depositions (including exhibits) of BellSouth's witnesses taken in the North Carolina proceeding.

Given the volume of this information, it is being provided in the form of a CD at this time. Today, BellSouth also is providing a copy of this CD to counsel for the Joint Petitioners and to counsel for the Office of Regulatory Staff. BellSouth will be happy to submit paper copies of any of this information that the Commission might desire.

Also enclosed for filing is an original and ten copies of BellSouth's motion to protect certain proprietary information on the CD from public disclosure. BellSouth's proprietary information is designated as such and appears in documentation responsive to the Florida Staff's Discovery Requests in the Florida proceedings and to the Joint Petitioners' Discovery Requests in the North Carolina proceedings. This proprietary information already has been afforded confidential status by the Florida and North Carolina Commissions.

Sincerely,



Patrick W. Turner

PWT/nml  
Enclosures  
cc: Parties of Record  
DM5 # 587155

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

In the Matter of )  
 )  
Joint Petition for Arbitration of )  
 )  
NewSouth Communications Corp., )  
NuVox Communications, Inc. )  
KMC Telecom V, Inc., KMC Telecom III LLC, and )  
Xspedius Communications, LLC on Behalf of its )  
Operating Subsidiaries Xspedius Management Co. )  
Switched Services, LLC, Xspedius Management Co. )  
Of Charleston, LLC, Xspedius Management )  
Co. of Columbia, LLC, Xspedius Management Co. )  
Of Greenville, LLC, and Xspedius Management Co. )  
Of Spartanburg, LLC )  
 )  
Of an Interconnection Agreement with )  
BellSouth Telecommunications, Inc. )  
Pursuant to Section 252(b) of the )  
Communications Act of 1934, as Amended )  
 )

Docket No. 2005-57-C

**MOTION FOR PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the South Carolina Rules of Civil Procedure and Regulation 103-854, BellSouth Telecommunications, Inc. ("BellSouth") respectfully requests that the Public Service Commission of South Carolina ("the Commission") issue an order protecting certain proprietary information from public disclosure.

Pursuant to the Joint Motion Regarding Procedure in this docket, BellSouth has submitted various items from the Florida<sup>1</sup> and North Carolina<sup>2</sup> proceedings to be incorporated

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<sup>1</sup> *In the Matter of Joint Petition for Arbitration of NewSouth Communications Corp., NuVox Communications Corp., KMC Telecom V, Inc., KMC Telecom III LLC, and Xspedius Communications, LLC on Behalf of its Operating Subsidiaries Xspedius Management Co. Switched Services, LLC and Xspedius Management Co. of Jacksonville, LLC; Docket No. 040130-TP.*

into the record of this docket. Some of these items are proprietary in nature and are designated as such. BellSouth's proprietary information appears in documentation responsive to the Florida Staff's Discovery Requests in the Florida proceedings and to the Joint Petitioners' Discovery Requests in the North Carolina proceedings. This proprietary information already has been afforded confidential status by the Florida and North Carolina Commissions.

BellSouth, therefore, respectfully requests that the Commission enter an Order protecting this proprietary information from public disclosure.

Respectfully submitted, this 26th day of May, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.



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<sup>2</sup> *In the Matter of: Joint Petition for Arbitration of NewSouth Communications Corp., et al. of an Interconnection Agreement with BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the Communications Act of 1934, as Amended; Docket Nos. P-772, Sub 8; P-913, Sub 5; P-989, Sub 3; P-824, Sub 6; P-1202, Sub 4.*

# CERTIFICATE OF SERVICE

2005-57-C to be served upon the following this May 26, 2005:

(U. S. Mail and Electronic Mail)

(U. S. Mail and Electronic Mail)

(U. S. Mail and Electronic Mail)

(U. S. Mail and Electronic Mail)

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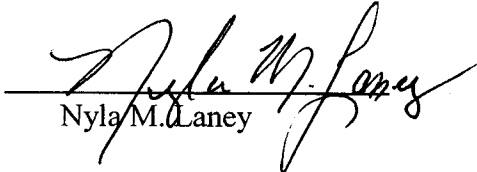
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PC Docs # 577384